

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

|  |   |                                  |
|--|---|----------------------------------|
| TYLUS ALLEN JR.,                                   | ) |                                  |
|  | ) |                                  |
| Plaintiff,   | ) |                                  |
|  | ) |                                  |
| v.   | ) | No. 19-cv-7904                   |
|  | ) |                                  |
| VILLAGE OF OAK LAWN POLICE                         | ) | Honorable Charles R. Norgle, Sr. |
| DETECTIVES S. HEILIG, M. MCNEELA, <i>et. al.</i> , | ) |                                  |
|  | ) |                                  |
| Defendants.  | ) |                                  |

**UNOPPOSED MOTION FOR LEAVE TO FILE ANSWER *INSTANTER***

Defendant, JASON TUDRYN, by and through one of his attorneys, Julie M. Koerner, respectfully moves the Court for leave to file *instanter* his Answer to Plaintiff's Complaint. In support thereof, Defendant states as follows:

1. On December 3, 2019, Plaintiff filed a Complaint seeking to recover damages for a violation of his civil rights by Defendant Officers, pursuant to §1983, that is alleged to have occurred on December 2, 2018. Complaint (ECF Doc. 1).

2. Defendant Tudryn was served with summons on January 23, 2020, which meant that his responsive pleading was due on February 13, 2020. Verification of Service (ECF Doc. 10).

3. Through no fault of Officer Tudryn, who promptly provided notice of the lawsuit and requesting a defense and indemnification to his employer, the City of Burbank, unknown City employees delayed and/or misplaced the lawsuit prior to turning it over to the City's insurer, IPMG.

4. As of June 17, 2020, Officer Tudryn is now represented by counsel, has conferred with same, and counsel is prepared to file a responsive pleading *instanter*.

5. Movant contacted Plaintiff's counsel, Jaclyn Diaz, who indicated that she has no objection to the motion.

6. Pursuant to Federal Rule of Civil Procedure 6(b)(1)(B), counsel begs this Court's indulgence with the late filing.

7. No prejudice will result to the Plaintiff from this filing.

Wherefore, Defendant, JASON TURDYN, respectfully requests that this Honorable Court grant him leave to file his Answer *instante*.

Respectfully Submitted,

**TUDRYN,**

By: S/ Julie M. Koerner  
Julie M. Koerner, #6204852  
O'Halloran Kosoff Geitner & Cook, LLC  
650 Dundee Road, Suite 475  
Northbrook, Illinois 60062  
Phone: 847/291-0200  
Email: [jkoerner@okgc.com](mailto:jkoerner@okgc.com)

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

|  |   |                                  |
|--|---|----------------------------------|
| TYLUS ALLEN JR.,                                   | ) |                                  |
|  | ) |                                  |
| Plaintiff,   | ) |                                  |
|  | ) |                                  |
| v.   | ) | No. 19-cv-7904                   |
|  | ) |                                  |
| VILLAGE OF OAK LAWN POLICE                         | ) | Honorable Charles R. Norgle, Sr. |
| DETECTIVES S. HEILIG, M. MCNEELA, <i>et. al.</i> , | ) |                                  |
|  | ) |                                  |
| Defendants.  | ) |                                  |

**CERTIFICATE OF SERVICE**

I hereby certify that on June 18, 2020, I electronically filed ***Defendant Tudryn's Motion for Leave To File Answer Instantly*** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Edward M. Fox – [efox@efoxlaw.com](mailto:efox@efoxlaw.com)  
Jaclyn Diaz – [jdiaz@efoxlaw.com](mailto:jdiaz@efoxlaw.com)  
Thomas J. Condon, Jr. – [tcondon@pjmchicago.com](mailto:tcondon@pjmchicago.com)  
Miguel E. Larios – [mlarios@pjmchicago.com](mailto:mlarios@pjmchicago.com)

By: s/Julie M. Koerner  
Julie M. Koerner, #6204852  
O'Halloran Kosoff Geitner & Cook, LLC  
650 Dundee Road, Suite 475  
Northbrook, Illinois 60062  
Telephone: (847) 291-0200  
Fax: (847) 291-9230  
E-mail: [jkoerner@okgc.com](mailto:jkoerner@okgc.com)